

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

HANA F. AL JADER

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Cr. No. 05-10085-RCL

MOTION FOR RECONSIDERATION

Hana F. Al Jader (“the defendant”), by and through undersigned counsel, moves this Honorable Court to reconsider the denial of her motion for access to government witnesses. As the basis for this motion, the defendant avers that during a final status conference held on November 14, 2005, the defendant, through her attorneys, informed the Court that she intended to file a supplemental memorandum of law in support of her previously filed motion for access to government witnesses.¹ The Court permitted the defendant to file her supplemental memorandum of law provided that she presents it to the court by Wednesday, November 16, 2004. The defendant represented to the Court that she would file her supplemental brief before that date.

Following the conclusion of the status conference, the Court issued an order denying the defendant’s motion without allowing the defendant an opportunity to file her supplemental memorandum. The denial of her motion appears to contravene the Court’s verbal instructions at today’s status conference. In view of the permission granted to the

¹ Counsel reminded the Honorable Court that they had adopted the motion filed in August of 2005 by prior counsel on behalf of the defendant. Counsel informed the Court that as it had not yet ruled on prior counsel’s motion, they planned to supplement the motion with a second memorandum of law.

defendant to file a supplemental memorandum prior to November 16, 2004, the defendant asks that the court vacate the denial of her motion for access to government witnesses in order to allow the defendant an opportunity to file her supplemental submission in accordance with the related schedule set forth today.

WHEREFORE, the defendant asks the Court to enter an order vacating the denial of her motion for access to government witnesses and permitting her to file a supplemental memorandum prior to November 16, 2005 as stated in the final status conference.

Dated: November 14, 2005

Respectfully submitted,
HANA AL JADER
By her attorneys,

/s/ Brad Bailey

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